Yay Jah 2 Honorable Gary Spraker 3 United States Bankruptcy Judge **Æ**ntered on Docket February 03, 2023 6 Jeffrey L. Hartman, Esq. Michael S. Budwick, Esq. #938777 – Admitted Pro Hac Vice Nevada Bar No. 1607 Solomon B. Genet, Esq. #617911 – Admitted *Pro Hac Vice* Meaghan E. Murphy, Esq. #102770 – Admitted Pro Hac Vice HARTMAN & HARTMAN Gil Ben-Ezra, Esq. #118089 – Admitted Pro Hac Vice 510 W. Plumb Lane, Suite B Alexander E. Brody, Esq. # 1025332 – Admitted Pro Hac Vice Reno, NV 89509 MELAND BUDWICK, P.A. T: (775) 324-2800 10 3200 Southeast Financial Center F: (775) 324-1818 200 South Biscayne Boulevard notices@bankruptcyreno.com 11 Miami, Florida 33131 T: (305) 358-6363 12 F: (305) 358-1221 13 mbudwick@melandbudwick.com sgenet@melandbudwick.com 14 mmurphy@melandbudwick.com gbenezra@melandbudwick.com 15 abrody@melandbudwick.com 16 Attorneys for Christina W. Lovato, Chapter 7 Trustee 17 UNITED STATES BANKRUPTCY COURT 18 DISTRICT OF NEVADA 19 l In re Lead Case No.: BK-19-50102-gs 20 DOUBLE JUMP, INC. (Chapter 7) 21 Debtor. Substantively Consolidated with: 22 DC Solar Solutions, Inc. 19-50130-gs 23 19-50131-gs DC Solar Distribution, Inc. 19-50135-gs DC Solar Freedom, Inc. 24 25 26 27

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CHRISTINA W. LOVATO,

Plaintiff,

v.

SANDRA SARKISSIAN, SUCCESSOR TRUSTEE OF THE SAM SARKISSIAN AND SANDRA SARKISSIAN LIVING TRUST DATED SEPTEMBER 4, 1997,

Defendant.

Adversary No.: 21-05026-gs

AGREED ORDER ESTABLISHING AMENDED DISCOVERY PLAN AND SCHEDULING ORDER

Hearing Date: N/A Hearing Time:

The Court having reviewed the pleadings on file, having been apprised of the agreement between Plaintiff, Christina W. Lovato, chapter 7 trustee ("Plaintiff") and Defendant, Sandra Sarkissian, Successor Trustee of the Sam Sarkissian and Sandra Sarkissian Living Trust Dated September 4, 1997 ("Defendant") and for good cause appearing,

IT IS ORDERED that the Court adopts the Scheduling Order, as follows:

- 1. Pre-Discovery Disclosures. The parties have already exchanged the information required by Fed. R. Civ. P. 26(a)(1).
- 2. Discovery Plan. The parties jointly propose to the court the following discovery plan:
 - a. Discovery will be needed on the following subjects: (i) the Transfers; (ii) Defendant's defenses, if any, to the Trustee's allegations in the Amended Complaint; (iii) insolvency and intent of the transferor at the time of the Transfers.
 - b. Fact discovery commenced in time to be completed by March 31, 2023.
 - Supplementations under Rule 26(e) due April 20, 2023.
 - d. Maximum of twenty-five (25) interrogatories by each party to any other party. Responses are due thirty (30) days after service.
 - e. Requests for admission by each party to any other party in accordance with Federal Rule of Civil Procedure 36. Responses are due thirty (30) days after service.

- f. Maximum of seven depositions by Plaintiff and seven depositions by Defendant. Each deposition limited to maximum of seven hours of deposition time unless extended by agreement of parties.
- g. Disclosure of expert testimony under Rule 26(a) due from Plaintiff and from Defendant by April 27, 2023.
- h. Expert discovery commenced in time to be completed by June 1, 2023.

3. Other Items.

- a. The parties shall mediate by May 3, 2023. The parties have agreed that the requirement to mediate has already been satisfied.
- b. All potentially dispositive motions must be filed by June 19, 2023.
- c. The parties request a pretrial conference in July 2023.
- d. Final lists of witnesses and exhibits under Rule 26(a)(3) will be due from Plaintiff and from Defendant seven days prior to the pretrial conference.
- e. Parties shall have ten (10) days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).
- f. The case should be ready for trial by August 1, 2023 and at this time, the trial is expected to take approximately three days.
- g. The parties do not request a conference with the Court before entry of this Order.
- h. This Order supersedes any prior scheduling order entered in this Adversary Proceeding.
- i. The Parties shall meet and confer if any other orders, statements, or directives issued by the Court alter, affect, or relate to this Order.
- j. The parties reserve the right to seek an order from this Court extending the time for discovery and related deadlines.

DATED: January 31, 2023

HARTMAN & HARTMAN

/s/ Jeffrey L. Hartman
Jeffrey L. Hartman, Esq., Attorney for Plaintiff

MELAND BUDWICK, P.A. /s/ Meaghan E. Murphy Meaghan E. Murphy, Esq., Attorney for Plaintiff **KAEMPFER CROWELL** /s/ August Hotchkin August Hotchkin, Esq., Attorney for Defendant